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13 *NETFLIX, INC.*

14 **UNITED STATES DISTRICT COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**
16 **OAKLAND DIVISION**

17 LAURI VALJAKKA,
18 Plaintiff,
19 v.
20 NETFLIX, INC.,
21 Defendant.

Case No. 4:22-cv-01490-JST

**DECLARATION OF SARAH E.
PIEPMEIER IN SUPPORT OF PARTIES'
JOINT STIPULATION FOR EXTENSION
OF TIME FOR DEFENDANT TO
RESPOND TO PLAINTIFF'S SECOND
AMENDED COMPLAINT**

Judge: Hon. JON S. TIGAR

Declaration of Sarah E. Piepmeier

I, Sarah E. Piepmeier, hereby declare:

1. I am an attorney with the law firm Perkins Coie LLP, based in San Francisco, California, and am the lead counsel representing Defendant Netflix, Inc. I have personal knowledge of the facts set forth in this declaration and am competent to testify.

2. I am submitting this declaration in support of the Parties' Joint Stipulation and [Proposed] Order to Extend Time for Defendant to Respond to Plaintiff's Second Amended Complaint pursuant to Northern District of California Civil Local Rule 6-2.

3. On September 13, 2021, Plaintiff Lauri Valjakka ("Plaintiff" or "Valjakka") served Defendant Netflix, Inc. ("Defendant" or "Netflix") with a Complaint alleging infringement of U.S. Pat. No. 8,495,167 in the Western District of Texas. Valjakka then filed its First Amended Complaint on January 3, 2022, adding U.S. Pat. No. 10,726,102 to its allegations. The case was voluntarily transferred to the Northern District of California on March 8, 2022. The Parties agreed to a deadline of May 16, 2022 for Netflix to respond to Valjakka's First Amended Complaint, and the Court ordered this deadline on May 3, 2022.

4. Valjakka served Netflix with its Second Amended Complaint on May 12, 2022. Under Fed. Civ. P. 15(a)(3), Netflix's deadline to respond to Valjakka's Second Amended Complaint was May 26, 2022.

5. Netflix previously sought and received one extension of time in this case. It filed an unopposed administrative motion to extend the time to hold the Initial Case Management Conference from April 19, 2022 to May 3, 2022 because lead counsel was out of the country. (Dkt. 29, as granted Dkt. 32).

6. On May 14, 2022, I emailed opposing counsel to address the timing of Netflix's response to Valjakka's Second Amended Complaint. Counsel for Valjakka, Mr. Ramey, replied that Plaintiff agrees to Netflix's request for a fourteen (14) day extension to file its response to Plaintiff's Second Amended Complaint, until June 9, 2022.

